

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MAHLON OIE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

HUSCH BLACKWELL LLP,

Defendant.

Case No.: 2:24-cv-00672-LA

PLAINTIFF’S RESPONSE TO ORDER TO SHOW CAUSE (ECF NO. 20)

I. Introduction

Plaintiff MAHLON OIE (“Plaintiff”) submits this Response to the Court’s Order to Show Cause as to standing and dismissal of this case (ECF No. 20). Plaintiff and Defendant Husch Blackwell LLP (“Defendant”) have reached a proposed class settlement of this matter. *See* Notice of Settlement (ECF No. 21). As of the filing of this Response the Parties have fully executed the settlement agreement. As discussed at the June 18, 2025, hearing and as discussed below, Plaintiff has standing under Article III to proceed with this action in federal court.

Plaintiff has filed a First Amended Class Action Complaint (ECF No. 25) (the “FAC”) to more specifically allege the harm he suffered. The relevant amendments are found in paragraphs ¶¶ 32–40 and 49 of the FAC.

Plaintiff alleges that Defendant’s conduct—specifically, misrepresentations and omissions in its collection letter—constituted unfair and unlawful collection tactics that posed and caused an actual and imminent risk of real harm sufficient to establish standing. In particular, Plaintiff was harmed by being deprived of a meaningful opportunity to timely dispute the account and debt at issue, which he intended to do. The collection letter provided Plaintiff with only two days to act

from the date he received it, effectively preventing him from exercising his rights. See FAC ¶¶ 32–35.

Accordingly, Plaintiff has adequately alleged a concrete and particularized injury that is fairly traceable to Defendant’s conduct and redressable by this Court. Plaintiff respectfully submits that the constitutional requirements of Article III are satisfied, and dismissal on standing grounds would be improper.

Based on the foregoing, Plaintiff respectfully requests that the Court retain jurisdiction over this action and permit the parties to proceed with submitting papers in support of preliminary approval of the proposed class action settlement. If the Court retains jurisdiction, Plaintiff anticipates filing a Motion for Preliminary Approval of Class Action Settlement within sixty (60) days.

Dated: July 7, 2025

Respectfully submitted,

By: /s/ Gustavo Ponce

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notice of such filing to all attorneys of record in this matter. Any attorney not an ECF participant here, hard copies of the foregoing will be provided via personal delivery or by postal mail.

By: /s/ Gustavo Ponce
Gustavo Ponce, Esq.